

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

A.W., an individual,)	
)	
Plaintiff,)	CASE NO.: 2:25-cv-00603-ALM-EPD
)	
-v-)	
)	JUDGE: ALGENON L. MARBLEY
INTOWN PROPERTIES V LLC, et al.)	MAGISTRATE: ELIZABETH
)	PRESTON DEAVERS
Defendants.)	

**UNOPPOSED MOTION TO SET ASIDE THE JULY 7, 2025 DEFAULT ENTRY
AGAINST DEFENDANT P&S SHIVAM LLC AND TO EXTEND DEFENDANT P&S
SHIVAM LLC’S DEADLINE TO MOVE OR PLEAD IN RESPONSE TO
PLAINTIFF A.W.’S COMPLAINT**

Defendant P&S Shivam LLC (“Defendant”), by and through its undersigned counsel, pursuant to S.D. Ohio Civ. R. 6.1 and 7.3, respectfully moves this Court, *unopposed*, to (1) set aside the July 7, 2025 Entry of Default; and (2) extend Defendant’s time to move or plead in response to the Complaint to September 15, 2025. Defendant consulted with Plaintiff A.W. (“Plaintiff”) regarding this motion, and Plaintiff does not oppose it. The reasons supporting this motion follow below:

1. Defendant is named as a defendant in two separate cases in the Southern District of Ohio, Eastern Division related to alleged sex trafficking claims. Each case was filed close in time. One case is the instant case, *A.W. v. Intown Properties V LLC, et al.*, Case No. 2:25-cv-00603-ALM-EPD (“*A.W. Lawsuit*”). The other one is *B.K. v. Lee Elle Management LLC, et al.*, Case No. 2:25-cv-00705-ALM-EPD (“*B.K. Lawsuit*”).
- 2.

3. After service of the *A.W. Lawsuit*, Defendant attempted to engage counsel, which took until July 9, 2025. By this time, the Clerk entered a default against Defendant. Since counsel for Defendant is now involved, Defendant's counsel will need time to determine whether there is insurance coverage, to become familiar with the allegations and claims in the Complaint, and to conduct a preliminary investigation of the allegations and the claims in order to respond to the Complaint. Plaintiff agreed that she would not oppose the Court setting aside the Entry of Default and Plaintiff agreed to an extension until September 15, 2025, for Defendant to move or plead in response to the Complaint.
4. Defendant has not received any prior extensions of time to move or plead in response to Plaintiff's Complaint in this matter.

WHEREFORE, for good cause shown, Defendant requests that the Court grant this motion, including 1) setting aside the July 7, 2025 Entry of Default; and (2) extending Defendant's time to move or plead in response to the Complaint to September 15, 2025.

Respectfully submitted,

**OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.**

/s/ Samuel N. Lillard

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Attorneys for Defendant P&S Shivam LLC

CERTIFICATE OF SERVICE

I hereby certify that on July 25, 2025, a copy of the foregoing document was electronically submitted with the Clerk of Court using the CM/ECF system. Notice of filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Samuel N. Lillard

Samuel N. Lillard (0040571)

One of the Attorneys for Defendant